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7 Attorney for Bailey Aaron Hall

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BAILEY AARON HALL,

15 Defendant.
16

Case No. 2:16-cr-321-JAD-PAL

UNOPPOSED MOTION TO
CONDUCT A PRE-PLEA PRE-
SENTENCE INVESTIGATION
REPORT AND PROPOSED ORDER

17 The defendant, BAILEY AARON HALL, by and through his attorney of record,
18 Brian Pugh, Assistant Federal Public Defender, files this Unopposed Motion to Conduct a Pre-
19 Plea Pre-Sentence Investigation Report on Bailey Aaron Hall.

20 On November 8, 2016, Mr. Hall was charged by indictment with four counts of
21 interference with commerce by robbery in violation of 18 U.S.C. § 1951, three counts of
22 brandishing a firearm during a crime of violence in violation of 18 U.S.C. § 924(c)(1)(A), and
23 one count of discharging a firearm during a crime of violence in violation of 18 U.S.C. §§
24 924(c)(1)(A). ECF No. 14.

25 The parties are attempting to negotiate this case. The parties believe that they may be
26 able to resolve this case short of trial. The parties are uncertain regarding the implications of

1 Mr. Hall's criminal history on his potential sentencing guideline calculation. Mr. Hall's
2 criminal history calculation and his sentencing guideline range will necessarily affect the
3 outcome and disposition of the case and/or potential negotiations. The parties are unable to
4 definitively determine Mr. Hall's sentencing guideline range without knowing his entire
5 criminal history and therefore a pre-plea pre-sentence investigation report is requested.

6 To satisfy Mr. Hall's concerns and to assure that he has the information he needs to
7 make a truly knowing and intelligent decision, as whether to accept or reject a plea offer, he has
8 requested that a pre-plea pre-sentence investigation report be completed. Undersigned counsel
9 has spoken with AUSA Alexandra Michael and she does not oppose this motion. Trial in this
10 matter is set for June 20, 2017.

11 For the reasons stated above, the parties respectfully request that a pre-plea pre-sentence
12 investigation report be conducted in this matter.

13 DATED this 27th day of April 2017.

14 Respectfully Submitted,

15 RENE L. VALLADARES
16 Federal Public Defender

17 /s/ *Brian Pugh*

18 By: _____

19 BRIAN PUGH
20 Assistant Federal Public Defender
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 * * *

4
5 UNITED STATES OF AMERICA,

Case No.: 2:16-cr-321-JAD-PAL

6 Plaintiff,

ORDER

7 vs.

8 BAILEY AARON HALL,

9 Defendant.
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12 The reasons being sound, the parties being in agreement and the best interests of justice
13 and judicial economy being served:

14 IT IS HEREBY ORDERED that the Probation Department prepare a pre-plea
15 presentence investigation report for BAILEY AARON HALL.

16 DATED 28 day of April, 2017.

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19 UNITED STATES MAGISTRATE JUDGE
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